

MKB:EW
F. #2008R00430

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- against -

ALI EL RIDA,

Defendant.

- - - - - X

THE UNITED STATES ATTORNEY CHARGES:

S U P E R S E D I N G
I N F O R M A T I O N

Cr. No. 08-555(S-1)(ARR)
(T. 18, U.S.C., §§
513(a), 981(a)(1)(c),
2320(a), 2320(b)(1), 2
and 3551 et seq.;
T. 21, U.S.C., § 853(p);
T. 28, U.S.C.,
§ 2461(c); T. 49,
U.S.C., § 80303)

COUNT ONE

(Trafficking in Counterfeit Goods)

1. On or about October 27, 2006, within the Eastern District of New York and elsewhere, the defendant ALI EL RIDA, together with others, did knowingly and intentionally traffic in goods, to wit: erectile dysfunction tablets, and did knowingly use a counterfeit Pfizer Corporation mark on and in connection with such goods, the use of which counterfeit mark was likely to cause confusion, to cause mistake and to deceive.

(Title 18, United States Code, Section 2320(a), 2 and 3551 et seq.)

COUNT TWO

(Possession of Counterfeited Money Orders)

2. On or about August 28, 2008, within the Eastern District of New York, the defendant ALI EL RIDA did knowingly and intentionally possess counterfeited securities of an

organization, to wit: \$38,000 in counterfeited Heritage Bank of Florida money orders, with intent to deceive another person, organization and government.

(Title 18, United States Code, Sections 513(a) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

3. The United States hereby gives notice to the defendant charged in Count One that, upon his conviction of such offense, the government will seek forfeiture in accordance with: (a) Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property constituting or derived from proceeds obtained directly or indirectly as a result of such offense; (b) Title 18, United States Code, Section 2320(b)(1), which requires the forfeiture of any article bearing or consisting of a counterfeit mark used in committing a violation of Title 18, United States Code, Section 2320(a), and any property used, in any manner or part, to commit or to facilitate the commission of a violation of Title 18, United States Code, Section 2320(a); and (c) Title 49, United States Code, Section 80303, which requires the forfeiture of any aircraft, vehicle, or vessel involved in a violation of Title 49, United States Code, Section 80302, to wit, the transportation, concealment, receipt, possession, purchase, sale, exchange, or

giving away of contraband, including but not limited to the following:

a. MONEY JUDGMENT

A sum of money equal to \$5,000 in United States currency, for which the defendant is jointly and severally liable;

b. SPECIFIC PROPERTY

2,000 erectile dysfunction tablets bearing counterfeit Pfizer Corporation marks.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section

2461(c), to seek forfeiture of any other property of such defendant(s) up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 981(a)(1)(C) and 2320(b)(1); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c); Title 49, United States Code, Section 80303)

BENTON J. CAMPBELL
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

BY: 
ACTING UNITED STATES ATTORNEY
PURSUANT TO 28 C.F.R. § 136